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17 **UNITED STATES DISTRICT COURT**
18 **EASTERN DISTRICT OF CALIFORNIA**
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20 NATALY LOPEZ VARGAS, an individual, on
behalf of herself and all others similarly
21 situated,

22 Plaintiff,

23 v.

24 SAPUTO DAIRY FOODS USA, LLC, a
Delaware limited liability corporation; and
25 DOES 1 through 10, inclusive,

26 Defendants.
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28

Case No. 1:22-cv-01645-DJC-JDP

**JOINT STATUS REPORT AND
STIPULATION AND ORDER TO
MAINTAIN STAY PENDING FINAL
SETTLEMENT APPROVAL**

Complaint Filed: November 21, 2022

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

Defendant Saputo Dairy Foods USA, LLC (“Saputo” or “Defendant”) and Plaintiff Nataly Lopez Vargas (“Vargas” or “Plaintiff”) (collectively, the “Parties”), by and through their respective attorneys of record, submit the following Joint Status Report and Stipulation.

STATUS OF LAWSUIT

1. On November 20, 2023, the Court stayed this case pending final approval of a global settlement that includes this action (“Global Settlement”), which the Parties are currently pursuing through the related action *Martinez v. Saputo Dairy Foods USA, LLC*, Case No. VCU294960 (Tulare Cnty. Sup. Ct.) (“*Martinez* PAGA Action”), and ordered the Parties to file a joint status report apprising the Court of the date set for a hearing on the motion for final settlement approval. (See ECF No. 30.)

2. On August 14, 2024, the court in the *Martinez* PAGA Action granted the Parties’ Motion for Preliminary Approval of the Global Settlement and set a Hearing on Final Approval of the Global Settlement for February 10, 2025 at 8:30 a.m.

3. The Parties hereby enter into the following stipulation, subject to court approval, to maintain the stay of the proceedings pending final approval of the Global Settlement.

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STIPULATION

IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. This action shall remain stayed pending final approval of the Global Settlement through the *Martinez* PAGA Action, Case No. VCU294960 (Tulare Cnty. Sup. Ct.).

2. In the event the court does not grant final approval of the Global Settlement in the *Martinez* PAGA Action, the Parties shall return to status quo as existed before this action was stayed.

IT IS SO STIPULATED.

Dated: November 25, 2024

JONES DAY

By: /s/ Koree B. Wooley

Koree B. Wooley

Attorneys for Defendant SAPUTO DAIRY
FOODS USA, LLC

Dated: November 25, 2024

MATERN LAW GROUP PC

By: /s/ Mikael H. Stahle (as authorized on
11/25/24)

Mikael H. Stahle

Attorneys for Plaintiff NATALY LOPEZ VARGAS

ORDER

Having considered the Joint Stipulation between all Parties, and good cause appearing,

1. This action shall remain stayed pending final approval of the Global Settlement through the *Martinez* PAGA Action, Case No. VCU294960 (Tulare Cnty. Sup. Ct.).

2. In the event the court does not grant final approval of the Global Settlement in the *Martinez* PAGA Action, the Parties shall return to status quo as existed before this action was stayed.

3. The parties shall file a joint status report within fourteen days after the hearing on Final Approval of the Global Settlement advising this Court on the status and/or outcome of the Global Settlement in the *Martinez* PAGA Action, Case No. VCU294960 (Tulare Cnty. Sup. Ct.) and shall promptly notify the Court of any change in said hearing's date.

IT IS SO ORDERED.

Dated: November 26, 2024

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE